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IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW HAMPSHIRE

IN RE: EX PARTE APPLICATION FOR EX PARTE ORDER TO DISCLOSE RETURNS, RETURN INFORMATION, AND TAXPAYER RETURN INFORMATION

APPLICATION FOR <u>EX PARTE</u> ORDER TO DISCLOSE INCOME TAX RETURNS AND RETURN INFORMATION

Pursuant to 26 U.S.C. §§ 6103(i)(1) and 6103(i)(4), the United States Attorney for the District of New Hampshire, Scott Murray, respectfully requests the Court to issue an *Ex Parte* Order directing the Internal Revenue Service to disclose the 2014 through 2019 federal tax returns and tax return information for the following individuals to Assistant United States Attorney Georgiana L. MacDonald:

Ian Freeman, a.k.a., Ian Bernard

DOB: 08-02-1980 SSN: 589-56-5839

Colleen Fordham DOB: 01/31/1961 SSN: 177-52-1847

Renee LeBlanc DOB: 07/27/1997 SSN: 02-80-6978

Nobody, a.k.a., Richard Paul

DOB: 12/5/1968 SSN: 362-72-0774

Mark Edgington DOB: 02/16/1971 SSN: 262-79-2773

Christopher Rietmann

DOB: 02/11/1964 SSN: 540-84-0613

Shire Free Church UNKNOWN EIN

Shire Free Church Monadnock UNKNOWN EIN

Church of the Invisible Hand UNKNOWN EIN

There is reasonable cause to believe that Ian Freeman, Colleen Fordham, Renee Leblanc, Nobody, Chris Rietmann, and Mark Edgington were involved in a conspiracy to operate an unlicensed money service business, in violation of 18 U.S.C. §1960, continuing financial crimes enterprise, in violation of 18 U.S.C. § 225 and bank fraud in violation of 18 U.S.C. § 1344.

An investigation conducted by the Federal Bureau of Investigation and the Internal Revenue Service Criminal Investigations has uncovered evidence that Ian Freeman, Colleen Fordham, Renee Leblanc, Nobody, Chris Rietmann, and Mark Edgington were involved in the operation of an unlicensed money service business by operating Bitcoin ATMs without proper registration with FinCEN, and advertising exchanging services online without registering from FinCEN. In addition, the above-named individuals appear to have fraudulently opened bank accounts in the name of a church to conceal the true nature of their business—i.e., an unlicensed money service business. Furthermore, it has been discovered that many individuals sending cash and wires to Ian Freeman and associates are victims of various scams, including many victims of romance scams. Ian Freeman and associates appear to be laundering the proceeds of wire fraud activities through the unlicensed money service business.

Investigators identified several Bitcoin ATMs as being purchased from GeneralBytes by Ian Freeman or his associates. GeneralBytes is a company which, according to its website,

https://www.generalbytes.com/aboutus/, is the "world's largest Bitcoin, Blockchain and Cryptocurrency ATM manufacturer." According to the website, GeneralBytes' main offices are located in the Czech Republic and it has satellite offices in Florida.

Records from GeneralBytes include sales agreements with the Shire Free Church in Manchester, New Hampshire, represented by Ian Freeman. The records include invoices for the ATM devices purchased and indicate that the devices were sent to various addresses in New Hampshire at Freeman's instruction.

The "Shire" web-page, https://shiresociety.com/crypto/, describes Freeman's network of "Shire Crypto Vending" machines (CVM) in the State of New Hampshire to sell "Bitcoin and other cryptocurrencies." The website describes the "CVMs" as follows:

It's important to note that the church's Crypto Vending Machines are not ATMs, though many confuse the two terms. The machines sell a digital product, cryptocurrency, for cash, like any other vending machine. The CVMs are one-way. They just vend, they don't buy crypto or dispense cash. The machines are stocked with crypto and sell from that stock. The CVM is not making purchases for the customer on an exchange. Machines that do that have ridiculous identification requirements.

Your crypto is your business and as a customer of the church, your privacy is respected. (While our machine does not require identification, there is security monitoring the premises.)

In May 2019, agents spoke with an Enforcement Specialist at FinCEN who informed the agents that the "Shire Crypto Vending" machines are called CVC kiosks and must be licensed with FinCEN because Freeman's CVC kiosks are electronic terminals which accept and dispense currency, i.e, they accept United States Currency cash and transmit the equivalent value in Bitcoin.

Freeman's CVC kiosks, however, are not licensed with FinCEN. In August 2019, at my request, FinCEN searched certified Bank Secrecy Act records. The search showed that that

between January 1, 2001, and August 19, 2019, none of the CVC kiosks owned by Freeman and the Shire Free Church were licensed as money service businesses.

Undercover transactions were performed at the machines controlled by Freeman. At various times throughout the investigation the fees charged by the machines ranged between 7% and 15%. It appears 15% is the standard rate on the machines currently. The fees for each transaction would be classified as income to Ian Freeman and therefore taxable under federal tax laws.

According to public records, Ian B. Freeman was born "Ian Bernard." Around November 7, 2013, he changed his last name to Freeman. Subpoenaed records from some of Freeman's bank accounts contain applications in which Freeman describes himself as a "Cyrptocurrency Minister," and as a member of the Shire Free Church. Various online postings and public records also link Freeman to the Shire Free Church. According to Freeman's Twitter account, @FTL_Ian, Freeman is a "Peace Minister of the Shire Free Church" and the host of Free Talk Live. Freeman identifies himself through postings as the user of this Twitter account. Numerous bank records associated with Freeman's accounts list him as a minister or a cryptocurrency minister. Freeman is also a blogger on the FreeKeene.com website.

A review of public records has not yielded results to indicate that Shire Free Church, Shire Free Church Monadnock and Church of the Invisible Hand are 501(C)(3) charitable organizations. In addition, a review of the Board of Assessors Meeting on June 11, 2014, in Keene, New Hampshire, determined that Shire Free Church Monadnock did not meet the tax-exempt status requirements and was denied recognition as a church. Any and all tax returns associated with the business and individuals will help determine how the funds received are being classified.

Investigators have not been able to find any evidence that Ian Freeman, Colleen Fordham, Renee Leblanc, Nobody, Chris Rietmann, and Mark Edgington have legitimate income sources. Colleen Fordham, Renee Leblanc, Nobody, Chris Rietmann, and Mark Edgington have all opened bank accounts used by Ian Freeman or the church entities discussed herein to receive cash and sell bitcoin and/or were involved in operating the Bitcoin ATMs.

Investigators seek the tax returns and return information for Ian Freeman, Colleen Fordham, Renee Leblanc, Nobody, Chris Rietmann, and Mark Edgington in order to determine whether they have any legitimate sources of income that would explain the large sums of cash they had access to or to provide other information to explain how they are able to financially support themselves. Evidence obtained from the tax returns or the lack of tax returns may provide information suggesting that the targets of this investigation have unexplained wealth. This information may suggest that the targets are obtaining funds through unlawful means, such as the operation of an unlicensed money service business. The lack of legitimate income sources may also provide evidence to suggest that certain financial transactions (such as purchases of vehicles or other property) were made using the proceeds of this activity.

The government has made substantial efforts to obtain this information by other means and assures the Court that the requested information cannot reasonably be obtained from a source other than the Internal Revenue Service and that the requested information will be used exclusively to investigate whether Ian Freeman, Colleen Fordham, Renee Leblanc, Nobody, Chris Rietmann, and Mark Edgington have committed violations of 18 U.S.C. §1960, operating a continuing financial crimes enterprise, 18 U.S.C. § 225, and bank fraud in violation of 18 U.S.C. § 1344.

Accordingly, pursuant to 26 U.S.C. §§ 6103(i)(1) and 6103(i)(4), the government

requests the Court to issue an Order directing the Internal Revenue Service to disclose the 2014 through 2019 income tax returns and return information Ian Freeman, Colleen Fordham, Renee Leblanc, Nobody, Chris Rietmann, Mark Edgington, Shire Free Church, Shire Free Church Monadnock and Church of the Invisible Hand to United States Attorney Murray, Assistant United States Attorney MacDonald, any Assistant or Special Assistant United States Attorney that is assigned by United States Attorney Murray to prosecute or litigate matters relating the investigation, and any other law enforcement personnel who may participate in the investigation.

Respectfully submitted,

SCOTT MURRAY United States Attorney

October 7, 2020

Georgiana L. MacDonald Assistant U.S. Attorney

MA Bar #685375

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AUTHORIZATION FOR EX PARTE APPLICATION FOR ORDER TO DISCLOSE TAX RETURNS AND RETURN INFORMATION

I, Scott Murray, United States Attorney for the District of New Hampshire, pursuant to 26 U.S.C. §6103(i)(1), hereby authorize submission of the attached *Ex Parte* Application for Order to Disclose Tax Returns and Return Information of Ian Freeman, Colleen Fordham, Renee Leblanc, Nobody, Chris Rietmann, Mark Edgington, Shire Free Church, Shire Free Church Monadnock and Church of the Invisible Hand for the taxable periods 2014 through 2019.

Concord, New Hampshire

October 14, 2020

SCOTT MURRAY
United States Attorney

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW HAMPSHIRE

IN RE: EX PARTE APPLICATION FOR EX PARTE ORDER TO DISCLOSE RETURNS, RETURN INFORMATION, AND TAXPAYER RETURN INFORMATION

ORDER FOR DISCLOSURE OF INCOME TAX RETURNS AND RETURN INFORMATION

The Court having received and considered the Application of the United States for an Ex Parte Order, pursuant to Title 26, United States Code, Section 6103(i), directing the Internal Revenue Service to disclose certain returns and return information (including any collection file and examiner's file) in connection with the above-referenced investigation, and good cause appearing, the Court FINDS:

- 1. There is reasonable cause to believe, based upon information believed to be reliable, that violations of federal criminal statutes, namely, 18 U.S.C. §1960, 18 U.S.C. § 225, and 18 U.S.C. § 1344 have occurred;
- 2. There is also reasonable cause to believe that the returns and return information are or may be relevant to a matter related to the commission of such acts;
- 3. The returns and return information are sought exclusively for use in a federal criminal proceeding concerning such acts; and
- 4. The information sought cannot reasonably be obtained, under the circumstances, from another source.
 - 5. Applicant, United States Attorney Scott W. Murray and Assistant United States

Attorney Georgiana L. MacDonald are employees of the United States Department of Justice and are primarily and directly engaged in, and the information sought is solely for her use in, prosecuting the above-mentioned violations of 18 U.S.C. §1960, 18 U.S.C. § 225, 18 U.S.C. § 1344 and related offenses.

It is therefore ordered that the Internal Revenue Service:

1. Disclose such returns and return information (including any collection file and examiner's file) of:

Ian Freeman A.K.A Ian Bernard

DOB: 08-02-1980 SSN: 589-56-5839

Colleen Fordham DOB: 01/31/1961 SSN: 177-52-1847

Renee LeBlanc DOB: 07/27/1997 SSN: 02-80-6978

Nobody A.K.A. Richard Paul

DOB: 12/5/1968 SSN: 362-72-0774

Mark Edgington DOB: 02/16/1971 SSN: 262-79-2773

Christopher Rietmann DOB: 02/11/1964 SSN: 540-84-0613

Shire Free Church UNKNOWN EIN

Shire Free Church Monadnock UNKNOWN EIN

Church of the Invisible Hand UNKNOWN EIN

for the taxable periods 2014 through 2019, as have been filed and are on file with the Internal Revenue Service;

- 2. Certify where returns and return information described above have not been filed or are not on file with the Internal Revenue Service that no such returns or return information have been filed or are on file;
- 3. Disclose such returns and return information and make such certification only to United States Attorney Scott Murray, Assistant United States Attorney MacDonald, any Assistant or Special Assistant United States Attorney that is assigned by United States Attorney Murray to prosecute or litigate matters relating the investigation, and any other law enforcement personnel who may participate in the investigation.
 - 4. Disclose no returns or return information not described above.

It is further ordered that applicant Georgiana L. MacDonald, Assistant U.S. Attorney, and any officer or employee of any federal agency who may be subsequently assigned in this matter shall use the returns and return information disclosed solely in prosecuting the above-mentioned violations of 18 U.S.C. §1960, 18 U.S.C. § 225, and 18 U.S.C. § 1344, and such other violations of any federal criminal statutes, except those involving tax administration, although presently unknown, as are discovered, and preparing the matter for trial, and that no disclosure be made to any person except in accordance with the provisions of 26 U.S.C. § 6103 and 26 C.F.R. § 301.6103(i)(1).

(Date)	